

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JOSEPH A. DAOU and KAREN M. DAOU,

Plaintiff,

v.

BLC BANK, S.A.L., CREDIT LIBANAIS,  
S.A.L., AL-MAWARID BANK, S.A.L., and  
BANQUE DU LIBAN,

Defendants.

Case No. 1:20-cv-4438-DLC

**NOTICE OF MOTION TO DISMISS**

PLEASE TAKE NOTICE that upon the Declaration of Jeffrey D. Rotenberg, dated November 20, 2020, the exhibits attached thereto, and the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss the Plaintiffs' First Amended Complaint ("Memorandum"), defendants BLC Bank, S.A.L. ("BLC") and Credit Libanais, S.A.L.'s ("CL"), by and through their attorneys, DLA Piper LLP (US), will move before the Honorable Denise L. Cote, United States District Judge of the United States District Court, Southern District of New York, at 500 Pearl St., New York, New York 10007, on a date and at a time designated by the Court, for an Order pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the Complaint with prejudice and for such other and further relief as the Court deems necessary and proper. The grounds upon which BLC and CL seek relief are set forth in detail in the accompanying Memorandum.

Dated: November 20, 2020

Respectfully submitted,

**DLA PIPER, LLP (US)**

By: /s/ Jeffrey D. Rotenberg

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and Credit Libanais, S.A.L.*